

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

H. OLIVIA LORD,

Plaintiff,

V.

DWAYNE A. THOMPSON,

Defendant.

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CIVIL ACTION NO. 3:11-CV-3241-M
ECF

PLAINTIFF'S REQUESTED VOIR DIRE QUESTIONS

TO THE HONORABLE COURT:

Plaintiff Olivia Lord requests the Court to ask the following questions of the potential jurors or permit her counsel to do so:

1. Has a lawsuit ever been brought against you or any member of your family?

- IF YES, where, when, what was the type of case and the outcome?

Answer:

2. Are you, or any family member or friend, currently or have previously been employed by the City of Dallas, including the Dallas Police Department?

- IF YES, Is that yourself or someone else?
- If someone else, what is their relationship to you?
- What position do or did you/he/she hold?
- For how long?

Answer:

3. Have you or any family member had any law enforcement training or ever been employed in any capacity by any law enforcement agency? Have you or anyone close to you ever applied for a job in law enforcement?)
- IF YES, Is that yourself or someone else?
 - If someone else, what is their relationship to you?
 - What position do or did you/he/she hold (patrol, supervisor), and where?
 - For how long?
 - Will your or that person's experience or opinion affect your thinking in any way in this case or how you judge the witnesses and evidence?

Answer:

4. What contact have you or any family members had with police officers or other law-enforcement officers for your work? In your neighborhood? In your social life?

Answer:

5. In general, do you think you would be inclined to give greater weight to the testimony of a police officer than you would to an ordinary citizen, because he is a police officer?
- IF YES: Why is that?

Answer:

6. Would you require Olivia Lord to prove her case by anything more than a preponderance of the evidence, because she has brought suit against a police officer?

Answer:

7. What are your feelings about people bringing a lawsuit alleging that their civil rights have been violated?

Answer:

8. How do you feel about the size of money damages awarded in trials today?

Answer:

9. If supported by the evidence, would you have any difficulty awarding money for emotional pain, suffering, and mental anguish?

Answer:

10. Would you give any less weight to sworn deposition testimony presented at trial as opposed to live witness testimony?

Answer:

11. Is there any reason in your mind why you cannot hear and consider the evidence with an open mind and render a fair and impartial verdict?

Answer:

12. Is there anything about you, even if the subject has not already been asked, that you wish to make known to the Court and the attorneys that you feel might be important for them to know?

Answer:

Respectfully submitted,

By: /s/ Don Tittle

Don Tittle

State Bar No. 20080200

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ATTORNEY FOR PLAINTIFF

OLIVIA LORD

CERTIFICATE OF SERVICE

I certify that on December 24, 2013, I electronically filed the foregoing document with the clerk of the court for the United States District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

Tatia R. Wilson
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/s/ Don Tittle
Don Tittle